

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Rivastigmine Patent Litigation)	1:05-MD-1661 (HB)(JCF)
This document relates to:)	
All Actions)	Case Nos. 05-cv-7820-HB
)	05-cv-2234-HB
)	05-cv-2235-HB
)	04-cv-6045-HB
)	

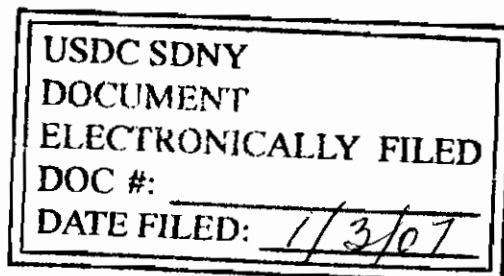
STIPULATION AND ORDER

WHEREAS, the Court entered an Order on November 27, 2006 concerning the schedule for the remaining pretrial proceedings in this litigation which required the parties to confer and submit a schedule to the Court once an Anchor Date is established; and

WHEREAS, the Court has established that the Anchor Date is December 15, 2006; and

WHEREAS, as discussed during the October 30, 2006 Court teleconference, the parties will consider further, and confer, as to which court(s) should resolve any claim construction issues, decide dispositive motions, and try the cases. The parties will thereafter, but prior to 34 weeks after the Anchor Date (August 10, 2007), advise the Court of their views on these issues.

WHEREAS, plaintiffs Novartis Pharmaceuticals Corporation, Novartis AG, Novartis Pharma AG, Novartis International Pharmaceutical Ltd., and Proterra AG (collectively, "Plaintiffs"), and defendants Watson Pharmaceuticals, Inc., Watson Laboratories, Inc. ("Watson") and Sun Pharmaceutical Industries, Ltd. ("Sun") (collectively "Defendants"), have conferred on an amended schedule to govern the remaining pretrial proceedings in this litigation;



NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs and Defendants that the following schedule shall govern the remainder of the proceedings in this Court.

<u>MILESTONE</u>	<u>DATE</u>
Final ruling by Court on privilege issues, or final production of documents by Plaintiffs in response to said ruling by the Court (whichever is later)	Anchor Date (December 15, 2006)
Service of Contention Interrogatories	2 weeks after Anchor Date (December 29, 2006)
Completion of Fact Discovery related to production of any documents previously withheld as privileged	8 weeks after Anchor Date (February 9, 2007)
Service of Responses to Contention Interrogatories	10 weeks after Anchor Date (February 23, 2007)
Identification of opening experts on which parties will rely for opening expert reports	11 weeks after Anchor Date (March 2, 2007)
Submission of opening expert reports	14 weeks after Anchor Date (March 23, 2007)
Production / identification of expert documents relating to opening expert reports	15 weeks after Anchor Date (March 30, 2007)
Submission of rebuttal expert reports	20 weeks after Anchor Date (May 4, 2007)
Production / identification of expert documents relating to rebuttal expert reports	21 weeks after Anchor Date (May 11, 2007)
Submission of reply expert reports	23 weeks after Anchor Date (May 25, 2007)
Production / identification of expert documents relating to reply expert reports	24 weeks after Anchor Date (June 1, 2007)

<u>MILESTONE</u>	<u>DATE</u>
Expert depositions	Start 25 weeks after Anchor Date through about 32 weeks after Anchor Date (June 8, 2007 – July 27, 2007)
Close of expert discovery	32 weeks after Anchor Date (July 27, 2007)
Simultaneous exchange of list of proposed meanings of claim terms requiring construction	34 weeks after Anchor Date (August 10, 2007)
Simultaneous Submission of Opening briefs concerning claim construction	38 weeks after Anchor Date (September 7, 2007)
Simultaneous Submission of Response briefs concerning claim construction	42 weeks after Anchor Date (October 5, 2007)
Submission of dispositive motions	46 weeks after Anchor Date (November 2, 2007)
Submission of responsive dispositive motion papers	50 weeks after Anchor Date (November 30, 2007)
Submission of reply dispositive motion papers	52 weeks after Anchor Date (December 14, 2007)

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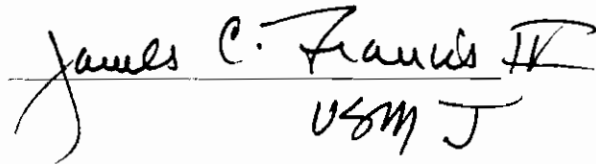
Novartis AG, Novartis Pharma AG,

Novartis International Pharmaceutical Ltd.,

and Proterra AG

SO ORDERED

This 28th day of December, 2006:


USMJ